

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

HON. LORI HACKENBERG,	:	
Plaintiff,	:	
	:	
v.	:	4:25-CV-01024
	:	
DANIEL BOZIN,	:	Judge Matthew W. Brann
BOZIN MEDIA GROUP, LLC d/b/a	:	
BOZIN MEDIA, and	:	
BOZIN HOLDINGS, LLC,	:	
Defendants.	:	JURY OF 12 DEMANDED

AFFIDAVIT OF DANIEL BOZIN IN SUPPORT OF
SPECIAL MOTION TO DISMISS

COMES NOW Defendant Daniel Bozin who states as follows:

1. I, Daniel Bozin, am the sole member of Bozin Media Group, LLC and Bozin Holdings LLC. As the sole member I have full authority to make statements on behalf of Bozin Media Group, LLC and Bozin Holdings LLC.

2. Neither I nor Bozin Media Group, LLC nor Bozin Holdings LLC originated, maintain or otherwise exercise ownership, administration and/or control of, or receive funds from the Change.org petition referenced in Plaintiff's First Amended Complaint ("FAC"). [Doc. 7, ¶ 40]

3. Neither I nor Bozin Media Group, LLC nor Bozin Holdings LLC created or published the image depicted at paragraph 41 of the FAC. [Doc. 7, ¶ 41]

4. Neither I nor Bozin Media Group, LLC nor Bozin Holdings LLC created, paid for, or published the image depicted at paragraph 43 of the FAC and showing Hackenberg with

Exhibit 2

horns. [Doc. 7, ¶ 43] Bozin did design the second image titled “Corruption” but it was modified by another person to add the QR code.

5. Neither I nor Bozin Media Group, LLC nor Bozin Holdings LLC originated, maintain or otherwise exercise ownership, administration and/or control of the Facebook page Impeach Judge Lori Hackenberg of Union and Snyder Counties, PA.

6. I did hire an aircraft to fly a banner as indicated in paragraph 47 of the FAC. [Doc. 7, ¶ 42]

7. I did post the material set forth in the paragraphs 55 and 59 of the FAC. [Doc. 7, ¶¶ 45-46].

8. I have at no time deleted to material set forth in the paragraphs 55 and 59 of the FAC. [Doc. 7, ¶¶ 45-46]. To the contrary, that material currently appears in my social media accounts.


9. I have at no time manipulated E.B. into making any attack on Hackenberg.

10. I have at no time manipulated the “Impeach Lori Hackenberg” social media page.

11. I did pay for the creation and publication of the www.fightcorruptionPA.com webpage. I do not have any ongoing to administer it.

I verify that the statements made herein are true and correct. I understand that the statements made herein are subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 07-08-2025



Daniel Bozin